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ECF Filed on 6/16/2022

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA

In Re:

LILLIAN JO SONDGEROTH DONOHUE,

Debtor.

Case No.: 22-11027-ABL Chapter 13

Date: OST Time: OST

ADDENDUM TO DEBTOR'S MOTION TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND SEQUESTER FUNDS (Dkt.#66) FOR COMMERCIAL PROPERTY 2240 EAST 2240 EAST CALVADA BLVD., PAHRUMP, NEVADA 89048

Debtor, Lillian Jo Sondgeroth Donohue ("Debtor" or "Donohue"), who files this addendum to her Motion to Sell Real Property Free and Clear of Liens and Sequester Funds, (Dkt.#66) to include an update on the Purchase Agreement to sell her commercial property 2240 East Calvada Blvd., Pahrump, Nevada 89048 ("2240 East Calvada Blvd.,"), the Debtor states as follows:

- 1. The offer to purchase the commercial property 2240 East Calvada Blvd., for \$550,000 has adjusted to \$540,000 due to the heating and cooling systems needing repairs.
- 2. The agreement on the sale of 2240 East Calvada Blvd., which had a deadline of August 8, 2022, has changed and escrow is scheduled to close on or before July 20, 2022. (See attached Ex. 'C'-Decl. L. Donahue and Ex. 'D'-Purchase Agreement).

Dated this 16th day of June, 2022

/s/CHRISTOPHER P. BURKE, ESQ. CHRISTOPHER P. BURKE, ESQ.